

NATALIE K. WIGHT, OSB #035576

United States Attorney

District of Oregon

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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 3:23-cv-00174-MO

v.

COMPLAINT IN REM
FOR FORFEITURE

**4309 OAKRIDGE ROAD, LAKE
OSWEGO, CLACKAMAS COUNTY,
STATE AND DISTRICT OF OREGON,
REAL PROPERTY WITH BUILDINGS,
APPURTENANCES, AND
IMPROVEMENTS, *in rem*,**

Defendant.

Plaintiff, United States of America, for its Complaint *in rem* for forfeiture, alleges:

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COUNT 1

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendant, *in rem*, real property located at 4309 Oakridge Road, Lake Oswego, Oregon, and further described as:

Parcel Number: 00242213
Map Number: 21E08CB00500

Lot 2, LAKE VIEW VILLAS FIRST ADDITION, in the City of Lake Oswego, County of Clackamas and State of Oregon.

EXCEPTING THEREFROM that portion conveyed to the City of Lake Oswego by Bargain and Sale Deed recorded April 8, 1983, as fee No. 83-009820, more particularly described as follows:

A portion of Lot 2, LAKE VIEW VILLAS FIRST ADDITION, in the City of Lake Oswego, Clackamas County and State of Oregon, described as follows:

Beginning at the intersection of the West line of said Lot 2, with the North line of Oak Ridge Road, said point being 15 feet North of the center line of Oak Ridge Road; thence North along the West line of said Lot 2, a distance of 15 feet; thence East 150 feet on a line parallel with the South line of said Lot 2; thence South along the East line of said Lot 2 a distance of 15 feet to the North line of Oak Ridge Road; thence West 150 feet to the point of beginning. FURTHER EXCEPTING THEREFROM any portion lying within Oak Ridge Road,

(hereinafter, DEFENDANT REAL PROPERTY).

DEFENDANT REAL PROPERTY is now and during the pendency of this action will be within the jurisdiction of this Court. DEFENDANT REAL PROPERTY is located in the State of Oregon, Clackamas County.

III.

DEFENDANT REAL PROPERTY, as described above, represents property constituting, or derived from, proceeds obtained directly or indirectly as a result of violations of 18 U.S.C. § 1014, and is therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C), as more particularly set forth in the Declaration of Rachel Royston, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, Plaintiff, United States of America, prays that due process issue to enforce the forfeiture of DEFENDANT REAL PROPERTY, *in rem*; that due notice be given to all interested persons to appear and show cause why forfeiture of this Defendant, *in rem*, should not be decreed; that due proceedings be had thereon; that this Defendant be forfeited to the United States; that the Plaintiff United States of America be awarded its costs and disbursements incurred in this action.

DATED: February 7, 2023.

Respectfully submitted,

NATALIE K. WIGHT
United States Attorney

/s/ Christopher L. Cardani
CHRISTOPHER L. CARDANI
Assistant United States Attorney

VERIFICATION

I, RACHEL ROYSTON declare, under penalty of perjury, pursuant to the provisions of Title 28, United States Code, Section 1746, that I am a Financial Investigator and Certified Fraud Examiner with the United States Attorney's Office, and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

/s/ Rachel Royston

RACHEL ROYSTON

Financial Investigator and

Certified Fraud Examiner

United States Attorney's Office